

**FORM
INSP**

Rev
X/20

**State of Colorado
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

01/05/2026

Submitted Date:

01/14/2026

Document Number:

717100450

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: _____ On-Site Inspection
 _____ Rollins, Grace _____ 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

ECMC Operator Number: 46290
 Name of Operator: KP KAUFFMAN COMPANY INC
 Address: 1700 LINCOLN ST STE 4550
 City: DENVER State: CO Zip: 80203

Findings:

- 6 Number of Comments
- 3 Number of Corrective Actions
- Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE**

Contact Information:

| Contact Name | Phone | Email | Comment |
|------------------|-------|-----------------------------|---------------------------------|
| , | | cogcc@kpk.com | All Inspections |
| Anderson, Laurel | | laurel.anderson@state.co.us | |
| Brown, Kari | | kari.oakman@state.co.us | |
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| Graber, Nikki | | nikki.graber@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------------------|--------|-------------|------------|---------|------------------------------------|-------------|
| 478832 | Flowline System | AC | 12/17/2020 | | - | Facility 2 | EI |
| 490663 | SPILL OR RELEASE | AC | | | - | Facility 2 Consolidation | EI |
| 492701 | SPILL OR RELEASE | AC | | | - | Facility 2 Consolidation 1/4/26 | EI |

General Comment:

ECMC Field Inspection Report Summary

This is an environmental inspection conducted in response to an Office of Emergency Preparedness and Response (OEPR) report on 01/05/2026 (see attachment, "OEPR Report - 01.05.2026"). The incident was subsequently reported to ECMC via Form 19, and Spill/Release Point ID 492701 was assigned. Spill/Release Point ID 490663 and Flowline System Facility ID 478832 were also included in the scope of this inspection. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. Operator personnel were on location of Spill/Release Point IDs 492701 and 490663 at the time of this field inspection. Photos attached to document site conditions.

Spill Name: Facility 2 Consolidation 1/4/26

Spill ID: 492701

Reported Date of Discovery: 01/04/2026

Spill Name: Facility 2 Consolidation

Spill ID: 490663

Reported Date of Discovery: 06/12/2025

Flowline System Facility ID: 478832 (both Spills)

Date of Inspection: 01/05/2026

Weather: Partly cloudy, windy, 59°F

See attached maps:

-Sensitive receptors and site layout, as mapped by COGIS: 2026_0105_Facility 2 Consolidation 1.4.26 Spill Receptors Map

-Site layout: 2026_0105_Facility 2 Consolidation 1.4.26 Spill Map

Spills are located within or adjacent to:

-The City of Fort Lupton (within)

-Residential building units (under construction on parcels to the southwest and east)

-Wetlands (Freshwater Emergent ~90 ft south of Spill ID 490663; Riverine <100 ft east of Spill ID 492701 and flowline system Facility ID 478832 runs through Riverine)

-Surface water (Fulton Ditch <100 ft east of Spill ID 492701, flowline system Facility ID 478832 runs through)

-Crop land (immediately adjacent to the west)

-Shallow Groundwater, as evidenced by (distances from Spill ID 492701):

DWR Dewatering Well Permit #64665-DW

-Depth to water 6' below grade surface (bgs), 1,230' WSW

DWR Dewatering Well Permit #63772-DW

-Depth to water 7' bgs, ~2,010' W

DWR Monitoring Well Permit #53111-MH

-depth to water 9.25' bgs, ~1,750' ENE

DWR Monitoring Well Permit #56642-MH

-depth to water 4-7' bgs, ~1,775' NE

Current site status of Spill ID 492701:

-A strong petroleum hydrocarbon odor was observed throughout the spill area.

-A hole is visible at the eastern extent of surficial stained soil. Operator personnel report that the hole is the point at which fluid was observed daylighting from the subsurface and that this fluid then flowed primarily west on the ground surface.

-Some soil has been scraped from the location; however, stained soil remains in situ.

-An area of scraped soil is visible at the northern edge of the spill location. Localized areas of stained soil are visible adjacent to vehicular tracks.

-Salt crusting is visible at and around the spill location.

-An unmarked soil stockpile is visible near the western extent of surficial stained soil. A liner is visible beneath the majority of the stockpile; however, the liner has holes/tears, and the soil does not have a berm and has spread off of the liner.

Current site status of Spill ID 490663:

-The excavations at the spill location have been backfilled.

-Spill ID has been open for 208 days and remains unresolved. The Form 19 — Supplemental Report for closure was due by 09/20/2025.

Current site status of flowline system Facility ID 478832:

-An area east of Fulton Ditch was inspected during an attempt to access the area of Spill ID 492701 ("east area").

-Multiple pieces of 3" fiberglass flowline were visible in the east area spanning approximately 400 ft east-west along the flowline path.

-Underground utility flags which read "KP KAUFFMAN" are visible throughout the east area.

-Operator personnel report that the flowline material changes from 8" steel to 3" HDPE in the approximate area of Spill ID 490663. See attached map, "2026_0105_Facility 2 Consolidation 1.4.26 Spill Map"

See CAs.

Inspected Facilities

Facility ID: 478832 Type: Flowline API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 490663 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 492701 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Spill ID 490663 was created to address the remediation of impacts identified along flowline system Facility ID 478832 on 06/12/2025. The excavations at the spill location have been backfilled. Spill ID 490663 has been open for 216 days and remains unresolved.

Corrective Action: Pursuant to Rule 912.b.(6) Operator was required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure. The Form 19 — Supplemental Report for closure was due by 09/20/2025. Operator shall submit delinquent form(s) for this project. Date: 09/20/2025

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

| Type | Management | Condition | GPS (Lat) | (Long) | |
|-------------------|---|-----------|-----------|--------|-------------|
| Oily Soil | Piles | | | | |
| Comment | An unmarked soil stockpile is visible near the western extent of surficial stained soil. A liner is visible beneath the majority of the stockpile; however, the liner has holes/tears, and the soil does not have a berm and has spread off of the liner. | | | | |
| Corrective Action | Per the COA on Form 19 Document # 404493306, E&P waste storage in stockpiles is not acceptable at this location. Operator shall comply with Rule 913.b.(5).B.iv. and properly store, handle, and manage all E&P Waste to prevent contamination of stormwater, surface water, Groundwater, and soil. | | | | Date: _____ |

Spill/Remediation:

Comment: Spill ID 492701 was created to address the remediation of impacts identified along flowline system Facility ID 478832 on 01/04/2026.
A strong petroleum hydrocarbon odor was observed throughout the spill area. A hole is visible at the eastern extent of surficial stained soil. Operator personnel report that the hole is the point at which fluid was observed daylighting from the subsurface and that this fluid then flowed primarily west on the ground surface. Some soil has been scraped from the location; however, stained soil remains in situ. An area of scraped soil is visible at the northern edge of the spill location. Localized areas of stained soil are visible adjacent to vehicular tracks. Salt crusting is visible at and around the spill location; investigation is required.

Corrective Action: A Form 19 — Supplemental Report is due by 01/14/2026. Pursuant to Rule 913.d.(1) Operator shall investigate impacts to soil and groundwater as soon as the impacts are discovered. Date: 01/14/2026

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

| Document Num | Description | URL |
|--------------|---|---|
| 717100451 | OEPR Report - 01.05.2026 | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7414243 |
| 717100454 | 2026_0105_Facility 2 Consolidation 1.4.26 Spill Receptors Map | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7414244 |

| | | |
|-----------|---|---|
| 717100455 | 2026_0105_Facility 2 Consolidation 1.4.26 Spill Map | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7414245 |
| 717100456 | ECMC Photo Log - Facility 2 Consolidation Spills (Spill IDs 492701 & 490663) - 01.05.2026 | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7414246 |
| 717100457 | ECMC Photo Log - Flowline System Facility ID 478832 (East) - 01.05.2026 | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7414247 |